

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF GEORGIA  
MACON DIVISION**

WILLIAM NORKUNAS, Individually,

Plaintiff,

v.

KHODIYAR HOTEL, LLC,  
a Georgia limited liability  
company and MATAJI ENTERPRISES, LLC  
a Georgia limited liability company

Defendant (s)

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Case No. 5: 11-cv-461-MTT

**STIPULATION FOR APPROVAL AND ENTRY OF  
CONSENT DECREE AND DISMISSAL OF CASE WITH PREJUDICE**

Plaintiff and Defendants, by and through undersigned counsel, hereby move this Court to approve and enter judgment on the Proposed Consent Decree annexed hereto as Exhibit A (the "Consent Decree").

Pursuant to Title III of the Americans with Disabilities Act this Court is authorized to enter a Consent Decree requiring a public accommodation to alter facilities to make such facilities readily accessible to and useable by individuals with disabilities to the extent required by Subchapter III of Chapter 126 of Title 42 of the United States Code. 42 USC '12188 (a)(2) 2000.

Wherefore, Plaintiff and Defendants respectfully request this Court to approve and enter judgment on the Consent Decree and retain jurisdiction to enforce the Consent Decree and Dismiss the Case with Prejudice.

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Date: Oct 23, 2013

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Date: Oct 9, 2013